

1 LANTZ ARNELL, MD

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FILED

08 MAR 10 PM 1:33

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY: 

DEPUTY

8
9 **United States District Court**
10 SOUTHERN DISTRICT OF CALIFORNIA
11

12 '08 CV 0441 J JMA
13

14 LANTZ ARNELL, MD

Civil Complaint

Demand for Jury Trial

15
16 Plaintiff

17
18 vs.
19

20 JACK LIEB ESQ. & Ass.

21 Judge William McAdam

22 (and others)

23 Defendants
24
25

26 PURSUANT to U.S.C. 18 § 1964, 18 § 2333(a) and any
27 other federal law that may be applicable, the plaintiff
28 files this timely complaint against the above named

1 defendants. This suit is not to be construed as a
2 complaint against the state of California. The state
3 of California has been victimized by the defendants and
4 is not responsible for their actions. Plaintiff does
5 not hold the State of California liable for the actions
6 of the defendants and is not named in this suit.

7
8 1. The Plaintiff is a businessman engaged in
9 interstate commerce from his home office in San Diego
10 County for over 20 years. Plaintiff is an Eye surgeon,
11 past President of the San Diego Chapter of the
12 National Medical Association and has been a consultant
13 for the FBI.

14
15 2. The Plaintiff is informed, believes and upon that
16 information alleges Jack Lieb & Associates (herein
17 after Lieb) includes Jack Lieb, and R. Fahey, lawyers
18 practicing in San Diego County.

19
20 3. Judge William McAdam (herein after McAdam) is and
21 was at the time specified herein, a San Diego County
22 Superior Court Judge.

23
24 4. The Plaintiff is currently unaware of the proper
25 identity, specific factual involvement, or cooperation
26 with or relation to other named defendants designated
27 as "and others". Consequently, Plaintiff sues these
28 defendants by such fictitious names and herein reserves

1 the right to amend this complaint when the true names
2 capacities, actions and other pertinent facts become
3 available.

4
5 5. FIRST CAUSE OF ACTION: RACKETEERING

6 The plaintiff is informed and based on that
7 information believes and there upon alleges that the
8 defendants are central figures in a continuing criminal
9 enterprise(herein after CCE)which has been attempting
10 to harm the Plaintiff for his property and his business
11 for several years. Activities of he CCE include but
12 are not limited to the following:

- 13 a. Murder
- 14 b. Murder for hire
- 15 c. Arson
- 16 d. Identity theft
- 17 f. Computer hacking
- 18 g. wire fraud
- 19 h. white slavery
- 20 I. Kidnaping
- 21 j. Staged Traffic Accidents
- 22 k. jury tampering
- 23 l. election fraud and intimidation at polling
24 places.
- 25 m. corruption of public officials
- 26 n. financing of street gangs.
- 27 O. Insurance fraud
- 28 p. perpetuation of religious intolerance.

1 The CCE is described with particularity on page 10
2 infra. Working for the CCE, Lieb and McAdam have
3 engaged in a pattern of racketeering previously unknown
4 in the United States. The San Diego County Superior
5 Court is an institution that effects interstate
6 commerce. Lieb and McAdam, as officials of that court
7 have successfully used that institution for
8 racketeering activities in violation of U.S.C. 18 §
9 1962. They use actors, make-up artists, identity
10 theft, staged auto accidents, violence, the threat of
11 violence and murder on an unprecedented scale.

12 A. A complaint alleging that McAdam is involved in
13 corruption and racketeering was filed in federal court
14 in 2007. The federal court ruled that McAdam failed to
15 answer the complaint. The plaintiff is informed,
16 therefore believes and now alleges that McAdam used
17 funds derived from the illicit activities of the CCE to
18 arrange a staged auto accident in the State of Illinois
19 to block the earlier complaint by targeting the
20 plaintiff's mother.

21 B. The Plaintiff is informed and there upon
22 alleges that Lieb and McAdam has engaged in staged auto
23 accidents, insurance fraud, bribery, internet hacking,
24 money laundering, identity theft, supplying persons
25 with false identification for sworn testimony in
26 superior court proceedings and depositions and other
27 predicate crimes in violation of U.S.C. 18 § 1962 and
28 U.S.C. 18 § 2332b. With money obtained from the

1 illegal activities of the CCE Lieb paid an associate to
2 represent him in a case where the insurance fraud
3 failed. The associate paid a group of people in the
4 CCE to try to intimidate the defendant in that case to
5 prevent him from showing up in court by the following:

6 a. McAdam was paid with illicit funds to
7 protect Lieb by denying a writ of Coram nobis under
8 color of right relating to that case,

9 b. Mcadam uses his influence to encourage the
10 Judge and clerks in that case to give Lieb favorable
11 rulings, with-hold documents, rearrange information in
12 the file and block access to the appellate court.

13 c. Lieb used, guards with guns, and people who
14 appeared to be criminals to approach and stare at the
15 plaintiff in order to intimidate him so he would have
16 reason to fear for his safety in the court house and in
17 the court room.

18 C. There have been three attempts to either kill
19 or maim the plaintiff by members of the CCE. Lieb was
20 involved in planing two of these attacks. The
21 plaintiff is informed, believes and thereupon alleges
22 Lieb and McAdam have used illicit funds from the
23 illegal activities of the CCE to arrange for
24 assassination attempts and are accessories to multiple
25 counts of fraud, and attempted murder.

26
27 6. SECOND CAUSE OF ACTION: AIDING AND ABETTING

28 A. On or about September 26, 2004, the plaintiff

1 was minding his own law-full business in his own
2 driveway when a man carrying the identification of
3 Randlett T. Lawrence, (herein after Lawrence) walked
4 silently up the driveway, armed himself with a 7.4
5 pound, 4.5 foot sword, (herein after the weapon) and,
6 without provocation, stabbed the plaintiff in the
7 chest, abdomen and arms. Lawrence walked to the
8 sidewalk and waited for the plaintiff to die.

9 B. Plaintiff filed charges against Lawrence.
10 Lawrence filed a complaint against the plaintiff (the
11 After Action Report) admitting conspiracy,
12 premeditation, malice aforethought, stalking, criminal
13 trespass and assault with a deadly weapon. Someone
14 high in the District Attorney's office dropped the
15 charges against Lawrence and aggressively pursued
16 charges against the plaintiff.

17 C. Judge Kerry Wells arraigned the plaintiff on
18 assault charges and later, after exparte communication
19 with the District Attorney's office, and with no
20 warning to the plaintiff, charged plaintiff with an
21 additional crime that did not apply while he was
22 without counsel. Plaintiff is informed, there upon
23 believes and upon this belief alleges that Judge Wells
24 knew Lawrence, his accompis, and co-conspirators.

25 D. The conspirators, all members of the CCE, paid
26 Lieb to sue the Plaintiff in civil court for injuries
27 Lawrence did not receive. Lieb knowingly and willingly
28 became an accessory after the fact to the attempted

1 murder and turned the suit into an insurance fraud.
2 When this failed, Lieb used money derived from the
3 illegal activities of the CCE to bribe the plaintiff's
4 attorneys to help him win a default judgement.

5 E. Lieb paid an associate to protect him and
6 Lawrence in the civil suit. The CCE brought in
7 McAdam to protect Lieb and Lawrence under color of
8 right using funds from other racketeering activities in
9 violation of U.S.C. 18 § 1962.

10
11 6. THIRD CAUSE OF ACTION: OBSTRUCTION OF JUSTICE

12 A. Lieb and McAdam know the plaintiff is innocent..
13 They also know that Lawrence is guilty of attempted
14 murder and they work in concert to obstruct justice
15 both inside and outside the court. McAdam covers up
16 prosecutorial misconduct and wire fraud. Lieb pays a
17 legion of criminals to perform illegal wire taps, home
18 invasions, robberies, staged auto accidents, identity
19 theft, internet hacking, con artists for manipulation
20 and intimidation of witnesses and "buzz marketing" to
21 protect McAdam and other judges.

22 B. The Plaintiff is informed, thereupon believes,
23 and consequently alleges that internet hacking and
24 supplying false identification to further the
25 objectives of the CCE transcends international
26 boundaries in violation of U.S.C. 18 § 2332b.

27
28 7. FOURTH CAUSE OF ACTION: FRAUD

1 A. Lieb paid an actress and make-up artist to
2 pretend she was Elizabeth Rosenthal, Lawrence's
3 accomplice, and this actress testified in open court
4 pretending to be Elizabeth Rosenthal.

5 B. There is no documented proof that Lawrence was
6 injured at the hands of the plaintiff and considerable
7 documentation that Lawrence committed perjury regarding
8 his injuries during the prove-up and in deposition.
9 Lieb commits fraud upon the court while McAdam protects
10 him in violation of U.S.C. 18 § 1962.

11 C. The plaintiff is informed, therefore believes
12 and upon that belief alleges that Lawrence is a
13 fictitious name on a fictitious drivers license. Lieb
14 brought the lawsuit as an insurance fraud. Lawrence's
15 true identity is unknown. Lieb is using the fake
16 identification to attack plaintiff's business and
17 property knowing that the injury he has caused the
18 plaintiff's property and his business in Lawrence's
19 name will be almost impossible to repair when Lawrence
20 assumes another identity.

21
22 8. Because of the illegal actions of Lieb and McAdam,
23 the plaintiff has been harmed in his person, business
24 and property.

25 A. The brand name has been injured.

26 B. To stay in business, clients and suppliers must
27 be protected from organized crime. The only way to
28 protect them is to make sure they are unknown. This

1 requires a lack of communication. No business can
2 survive without communication with business associates.
3 The illegal wire taps, rerouted and blocked telephone
4 calls, mail fraud and the legion of con artists the
5 CCE, including Lieb and McAdam, has paid to harass the
6 plaintiff make the pursuit of normal business activity
7 impossible.

8 C. The sole operator of an interstate business has
9 been placed in fear for his life and the lives of his
10 family and friends.

11 D. Potential business associates are harassed when
12 they walk up the driveway by people placed around the
13 house by Lieb.

14 E. With McAdam's help, Lieb has placed a lien on
15 the plaintiff's property.

16 F. The fraud has cost the business over
17 \$100,000.00. for legal expenses.

18
19 9. Request for Relief

20 Plaintiff prays for the following relief:

21 A. All Criminal charges and convictions against
22 plaintiff be dismissed.

23 B. The Civil case against plaintiff be dismissed
24 with prejudice.

25 C. McAdam and Lieb to pay legal expenses of
26 plaintiff as individuals without help from the State of
27 California.

28 D. Punitive damages as the Court allows paid by

1 defendants.

2 E. Release of lien and any other encumbrance on
3 Plaintiff's property

4 F. Full Federal investigation of the CCE.

5 G. Investigation into the death of Abigail Dickson
6 and disappearance of key witnesses.

7 H. All documents, databases, police files both
8 state and federal to show that plaintiff was falsely
9 accused and maliciously prosecuted.

10
11
12 10. Description of the CCE

13 A. Organization

14 a. The CCE is structured to appear like a
15 political action committee (herein after, PAC). In
16 Democratic counties it is a Democratic PAC. In
17 Republican counties it is Republican. Donations are
18 solicited from the party faithful and backing for
19 state, local and federal offices is given to
20 candidates. The surface appears legal.

21 b. The CCE requires everyone to perform a
22 task. McAdam was told to block a petition for Coram
23 Nobis where the plaintiff had evidence of attempted
24 murder. McAdam did as he was told, knowingly and
25 willingly becoming an accessory to the attempted
26 murder. The CCE holds this over McAdam's head, forcing
27 him to commit more illegal acts from the bench.

1 c. CCE candidates run unopposed for
2 reelection.

3 d. Anyone or entity involved in illegal
4 activity pays the CCE. Murder and maiming is their
5 specialty. The preferred method is the staged auto
6 accident. Fake witnesses, wire fraud using 911 calls,
7 preselected police to be "first on the scene" for
8 police reports and to manage the crime scene, and
9 protection from Lieb and McAdam.

10 e. With McAdam and Lieb, no CCE murderer goes
11 to trial or even gets charged with a crime.

12 f. The CCE hires physicians to make the wrong
13 diagnosis so that victims can be killed in the hospital
14 or at home. The wrong medication combined with coffee
15 laced with cocaine gives the illusion of a stroke. No
16 one does toxicology and the patient dies of "Natural
17 Causes".

18 B. Financing:

19 a. The CCE receives money from legal
20 activities that is used for advertising. Advertising
21 dollars are used to buy editorial opinion or omissions
22 in mass media.

23 b. Illegal funds are separated. Illicit cash
24 is used to refinance illegal operations. Illegal
25 income becomes an underground economy and dollars
26 become fungible. Bribes take the form of sexual
27 favors, vacations, early parole, vehicle leases,
28 mortgage refinancing and almost anything required to

1 secure profits and protection for the CCE.

2 c. Anyone who doesn't go along disappears.

3 d. None of the money gained from illegal
4 activities goes back into the economy. Consequently,
5 it is virtually invisible to the IRS.

6
7 B. History

8 1. This CCE surfaced in 1969 with the creation
9 and financing of a Chicago street gang called the Black
10 Stone Rangers. The CCE used paramilitary style
11 marching and clothing to give the illusion that it was
12 CIA financed and protected. The CCE cloaked itself in
13 corporate appearance but it is not a corporate entity.

14 2. The CCE supplied the gang with guns, drugs
15 and protection from the police. Profits from drug
16 sales were used to participate in the election process.
17 CCE politicians further insulate the CCE from
18 investigation.

19 3. To avoid detection and frustrate
20 investigators, the CCE changed the name of the gang
21 often.

22 4. An early revenue stream for the CCE
23 involved the disruption of communities. Gang activity
24 brought property values down and panic selling. The
25 CCE was able to acquire a luxury hotel from which the
26 gang ran gambling, drugs and prostitution. The hotel
27 was near a Jewish community. The gangs targeted this
28 community using anti-Semitic remarks and threats of

1 violence. Hundreds of families were displaced. The
2 CCE purchased their property under fictitious names for
3 less than market, pulled the gangs out and sold at over
4 market prices.

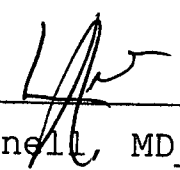
5 5. Arrests and prosecution of gang members put
6 gang leaders in prisons. The prison population is much
7 easier to segregate and gangs proliferate inside
8 prison. Drug sales inside prison and the revolving
9 door of parole allows gang leaders inside to control
10 criminal activities on the street.

11
12 C. The pattern of racketeering activity includes
13 but is not limited to Conspiracy to commit murder,
14 attempted murder, aiding and abetting, bribery,
15 obstruction of justice, identity theft, fraud, computer
16 hacking, wire fraud, and intimidation of witnesses.

17
18 D. As central figures in this CCE, Lieb and Mcadam
19 pose a threat to the judiciary of the state of
20 California and a clear and present danger to the
21 security of The United States of America.

22
23 The foregoing is true to the best of my knowledge.

24
25 Date: March 10, 2008

Signed 

Lantz Arnell MD

CIVIL COVER SHEET

JS 44 (Rev. 11/04)

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS LANTZ E. ARNEL

(b) County of Residence of First Listed Plaintiff SAN DIEGO
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

DEFENDANTS SACK LIEB
R. FAHEY
08 MAR 2008
JOHN ADAM
SAN DIEGO

County of Residence of First Listed Defendant SAN DIEGO
(EXCEPT IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

BY: 2
Attorneys (If Known) JMA DEPUTY

08 CV 0441

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State ☒ PTF ☒ DEF
- Citizen of Another State ☐ 2 ☐ 2 Incorporated or Principal Place of Business In This State ☐ 5 ☐ 5
- Citizen or Subject of a Foreign Country ☐ 3 ☐ 3 Foreign Nation ☐ 6 ☐ 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 430 Commerce <input checked="" type="checkbox"/> 460 Deportation <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609				

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation
- ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing. (Do not cite jurisdictional statutes unless diversity):

USC 18 § 1964
RICO FRAUD

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$ 100,000

CHECK YES only if demanded in complaint:
 JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE N. JONES

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

MARCH 10, 2008[Signature]

FOR OFFICE USE ONLY

RECEIPT # 148579 AMOUNT \$350

APPLYING IFP

JUDGE

MAG. JUDGE

3/10/08

**UNITED STATES
DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO DIVISION**

148579 - SH

**March 10, 2008
13:23:12**

Civ Fil Non-Pris

USAO #: 08CV0441

Judge.: NAPOLEON A JONES, JR

Amount.: \$350.00 CA

Total-> \$350.00

FROM: ARNELL V. LIEB ET AL